Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies	)	ET Docket No. 92-9

COMMENTS OF HUFFMAN COMMUNICATIONS, CAL AUTOFONE AND RADIO ELECTRONICS PRODUCTS CORP.

The above parties, which are licensed radio common carriers and small family owned businesses, respectfully submit these comments in regard to ET Docket No. 92-9.

Operating in rural areas in Texas (Huffman) and California (Cal Autophone and Radio Electronics) this Docket comes at a difficult time for us because, like many others, we are currently building out our regional paging and mobile telephone systems utilizing 2.1 - 2.2 Ghz microwave as the backbone. As it stands now, all microwave filings accepted after January 16, 1992 will be granted only on a secondary basis with the narrow exceptions outlined in the FCC public notice of May 14, 1992. This places at risk our equipment now in the process of being installed and seems a drastic and hurried step, especially when mandated upon all geographic areas of the nation and without taking into account the differences between the 1.85 - 2.20 Ghz sub-bands.

In the rural areas we have few choices in constructing communications backbones. Sometimes we can lease lines from the telephone companies or we can build our own microwave systems. We have found that it is much more cost effective and reliable to construct our own 2.1 - 2.2 Ghz systems , this portion of the band being designated for the narrow band 377, 96 or 48 channel systems we

need. We have found that we can purchase and install a 2 Ghz system for about one-half the cost of a 6 Ghz system. Therefore, since there are only small monthly maintenance costs once the equipment is paid for, we can operate much more efficiently and competitively with a direct benefit in savings to our customers, the general public. We would like to stress that while T-Span lines are available from the phone companies in the urban areas and in those environments could be cost effective with microwave, in the rural areas they are not always available and, in our experience, not cost effective. The cost of a microwave system in the 6 Ghz band or above will effectively eliminate the microwave option for small businesses and force us to deal with the phone companies. We feel it is likely that emerging technologies such as PCS will not be encumbered if the Commission were to continue to allow those of us in the RSA areas of the country to build 2.1 - 2.2 Ghz systems on a co-primary basis. Ours is a non-congested environment both in 2 Ghz frequency availability and population density. Those of us in rural areas adjacent to metropolitan regions would like to continue to utilize 2.1- 2.2 Ghz to connect with telco point of service or transmitter control sites at the edge of these metroplex regions but we have no need to build microwave systems into the highly populated core areas. We feel that, in our areas of the nation, we can co-exist with the emerging technology systems (both through the availability of frequencies and through the spectrum sharing techniques now being developed) if and when they eventually migrate to rural areas, but that in the meantime it is a drastic action to eliminate our access to 2.1 - 2.2 Ghz microwave systems either by an outright ban or by placing us on a secondary

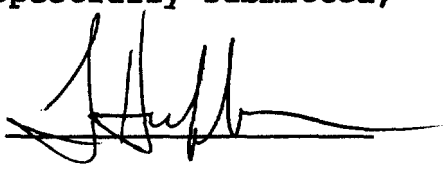
basis which essentially neutralizes any longevity in our investment.

We feel there is a great deal of difference between the various portions of the 2 Ghz band and these should be stressed. We, as common carriers, occupy only a small segment, i.e., 2110-2150 Mhz and 2160-2200 Mhz., which we share with the Private Operational Fixed services. In this 80 Mhz of spectrum, according to FCC report OET/TS 91-1, there are 19858 facilities in the nation. This is compelling testimony to success of narrow 2 Ghz microwave and is indicative of its importance to the technical/economic infrastructure of our country. Each of these systems carries traffic for hundreds of customers. They are reliable, inexpensive in relative terms, and represent a splendid example of resource management. We would urge that if it is decided that we must move, sufficient spectrum in the 1710 - 1850 Mhz Government band be made available to us both for our existing systems and for future narrow type microwave systems. The existing 80 Mhz of bandwidth would be sufficient and we feel it is likely that we could easily co-exist with the existing Government point to point systems. It would also be much less expensive because our equipment and antenna systems could be modified instead of replaced and our systems would continue to be very reliable due to the superiority of this band.

We would also like to suggest that all microwave systems, including those operating at 952 - 960 Mhz (12 channel capability), be allowed to carry both common carrier and private operational traffic. This would permit system sharing, eliminate the need for dual systems along frequently used paths, and make for much more efficient use of the entire microwave spectrum. All microwave spectrum would be available to all users, but with the existing

interference criteria still in place for each band.

Respectfully submitted,



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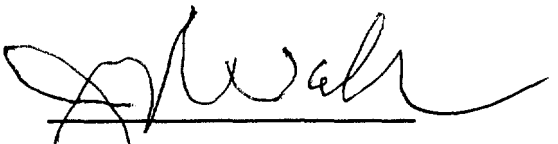

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